

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ADELINA C. ROCABRUNA &
MIGUEL A. ROCABRUNA,

Plaintiff,

v.

BANK OF AMERICA, N.A.,

Defendant.

Civil Action No. 1:12-cv-00506 (LMB/TCB)

DEFENDANT BANK OF AMERICA, N.A.'S MOTION TO FILE UNDER SEAL

Defendant Bank of America, N.A. ("BOA"), by counsel and pursuant to Local Rule 5 and the August 21, 2012 Stipulated Protective Order entered in this action, hereby moves to file under seal the portions of certain confidential and proprietary documents that Plaintiffs Adelina C. Rocabruna and Miguel A. Rocabruna seek to attach to their briefing in response to BOA's Opposition to the pending Motion to Compel filed by Plaintiffs.

Pursuant to Paragraph 10 of the Stipulated Protective Order, BOA shall file its memorandum in support of this Motion to File Under Seal on or before October 15, 2012.

WHEREFORE, BOA respectfully requests that this Court (1) GRANT BOA's Motion to File Under Seal; (2) ORDER that Exhibit A attached to Plaintiffs' Memorandum in Support of their Motion to File Documents Under Seal shall be maintained under seal and not otherwise publicly available; and (3) AWARD BOA its costs and attorneys' fees in pursuing this Motion, as well as any other relief it deems just and proper.

Dated: October 10, 2012

Respectfully submitted,

BANK OF AMERICA, N.A.

/s/

Brian E. Pumphrey (VSB No. 47312)
MCGUIREWOODS LLP
901 East Cary Street
Richmond, Virginia 23219
Phone: (804) 775-7745
Fax: (804) 698-2018
Email: bpumphrey@mcguirewoods.com

Anand V. Ramana (VSB No. 65852)
2001 K Street, NW, Suite 400
Washington, DC 20006
Tel: (202) 857-1734
Fax: (202) 828-2973
Email: aramana@mcguirewoods.com

Robert W. McFarland (VSB No. 24021)
9000 World Trade Center
Norfolk, Virginia 23510
Tel: (757) 640-3716
Fax: (757) 640-3966
Email: rmcfarland@mcguirewoods.com

Counsel for Defendant Bank of America, N.A.

CERTIFICATE OF SERVICE

I hereby certify that on the 10th of October, 2012, and in addition to the electronic service provided by this Court's ECF system, I served the foregoing pleading on the following persons via electronic mail and U.S. first-class mail, postage prepaid:

Leonard Anthony Bennett
Susan Mary Rotkis
CONSUMER LITIGATION ASSOCIATES, PC
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, VA 23601
Telephone: 757-930-3660
Facsimile: 757-930-3662
Email: lenbennett@clalegal.com
Email: srotkis@clalegal.com

Kristi Cahoon Kelly
SUROVELL ISAACS PETERSEN & LEVY PLC
4010 University Dr
Suite 200
Fairfax, VA 22030
703-277-9774
Fax: 703-591-9285
Email: kkelly@siplfirm.com
Counsel for Plaintiff

_____/s/
Brian E. Pumphrey (VSB No. 47312)
McGUIREWoods LLP
901 East Cary Street
Richmond, Virginia 23219
Phone: (804) 775-7745
Fax: (804) 698-2018
Email: bpumphrey@mcguirewoods.com
Counsel for Bank of America, N.A.